

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	
)	
)	Cr. No. 20-174
v.)	
)	
)	
NICHOLAS LUCIA,)	District Judge Schwab
)	
Defendant)	

CONSENT MOTION TO EXTEND DUE DATE FOR PRETRIAL MOTIONS

COMES NOW, defendant above-named, by and through attorneys Patrick M. Livingston and A. Kayleigh Shebs, and respectfully moves to extend the due date for filing pretrial motions.

The due dates for pretrial motions in this matter were extended at Mr. Lucia's August 31, 2020 arraignment, and again on or about October 14, 2020, January 6, 2021, February 25, 2021 and March 30, 2021. Undersigned counsel needs additional time to review discovery materials and to investigate, research and prepare possible defenses, including defenses required by Fed. R. Crim. P., Rule 12 to be raised before trial. Counsel for the government consents to the within motion and, indeed, the extension protects Mr. Lucia's right to the effective assistance of counsel, the public interest in fair proceedings and in a safe venue in which to hold public proceedings, as indicated by the administrative orders entered in this Court in response to the public health emergency.

WHEREFORE, for these reasons, defendant respectfully requests entry of an order extending the due date for pretrial motions for a period of thirty (30) days, until July 1 2021.

Respectfully submitted,

/s/**Patrick M. Livingston**

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